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July 20, 2000

Mr. Bhupendra Khona
Remedial Project Manager
Hazardous Site Clean-up Division
Western Pennsylvania Remedial Section
(Mail Code 3HW23)
USEPA Region III
1650 Arch Street
Philadelphia, PA 19103-2024

RE: MW MANUFACTURING SUPERFUND SITE
VALLEY TOWNSHIP, PA
RESPONSE TO COMMENTS
SUPPLEMENTAL PRE-DESIGN INVESTIGATION REPORT
ADDENDUM 1 – OU3
APRIL 24, 2000

Dear Mr. Khona:

Lucent Technologies, on behalf of Nassau Metals Corp. (Nassau) is providing responses to comments transmitted to us in correspondence dated July 14, 2000. McLaren/Hart, Inc. (McLaren/Hart) has prepared these responses on behalf of Nassau. EPA's correspondence included comments by EPA and PADEP regarding the aforementioned April 24, 2000 Supplemental Pre-Design Investigation Report (SPDIR) Addendum 1 submittal.

Our understanding is that satisfactory response to these comments will allow EPA to provide final approval to the SPDIR (originally submitted March 1999) and facilitate the process of issuing an Explanation of Significant Differences (ESD) for OU-3. The comments are being provided consistent with the requirements of the Administrative Order (AO) Docket No. III-93-27-DC, dated March 31, 1993 issued by EPA pursuant to Section 106(a) of CERCLA 42 U.S.C. 9606(a), as amended and the EPA-approved Remedial Design Work Plan (RDWP) dated July 7, 1994 as well as the Remedial Design Work Plan Addendum dated August 1996.

Each of the specific EPA and PADEP comments have been provided along with an associated response as Attachment 1. Please feel free to contact me at (973) 606-2690 if you have any questions.

Very truly yours,

Terrence Hunter (PK)

Terrence A. Hunter, P.E.
Project Coordinator

cc: Maria Kaouris – Lucent
Ralph McMurry, Esq. - Lucent
Sam Gutter, Esq. – Sidley Austin
Kevin Kroculick, P.E. – PADEP
Perry Katz – McLaren/Hart

ATTACHMENT 1 TO OPERABLE UNIT 3 (OU-3)
SUPPLEMENTAL PRE-DESIGN INVESTIGATION REPORT
RESPONSE TO COMMENTS 7/14/00
MW MANUFACTURING SITE
VALLEY TOWNSHIP, PENNSYLVANIA

McLaren/Hart is in receipt of the following correspondence which provides comments on the Operable Unit 3 (OU-3) Supplemental Pre-Design Investigation Report (SPDIR), Addendum 1 dated April 24, 2000, for the MW Manufacturing Site located in Valley Township, Pennsylvania. The SPDIR was prepared on behalf of Nassau Metals Corporation (Nassau) by McLaren/Hart, in accordance with the Administrative Order (AO) dated March 31, 1993.

- Facsimile dated June 29, 2000 from Ms. Barbara Rudnick, P.G., of the EPA, addressed to Mr. Bhupendra Khona of the EPA.
- Letter dated May 22, 2000 from Mr. Bruce Pluta of the EPA's Biological Technical Assistance Group, to Mr. Bhupendra Khona of the EPA.
- Letter dated May 9, 2000 from Ms. Lynn Flowers, Ph.D., DABT, of the EPA, addressed to Mr. Bhupendra Khona of the EPA.
- Memo dated June 19, 2000 from Mr. Kevin Kroculick of the Pennsylvania Department of Environmental Protection (PADEP), addressed to Mr. Bhupendra Khona of the United States Environmental protection Agency (EPA).

These letters were received by McLaren/Hart via facsimile. Nassau has reviewed the above correspondence and McLaren/Hart has prepared the following responses to those comments.

1. Comment from Mr. Barbara Rudnick,USEPA

The MW package looks ok. The only thing I noticed was that historically, they have not always been including vinyl chloride for analysis. It must be included as a breakdown product.

McLaren/Hart's Response:

A final long-term monitoring plan for groundwater has yet to be developed and proposed to EPA and PADEP. However, it is expected that vinyl chloride would be a constituent to be monitored to track the progress of natural attenuation as well as to aid in the on-going assessment of groundwater quality and remediation.

2. **Comment from Bruce Pluta, USEPA**

We are pleased that the reinjection or dispersal of the treated water into the off-site wetlands will be evaluated via modeling (page 17 of response document). We fully support the decision to give these scenarios strong consideration in light of their potential to minimize wetland disturbance. However, we are unable to identify changes in the Revised Pages for the March 1999 SPDIR which reflect this position. There is no mention of the proposed modeling and evaluation in the revised section 9.3 Conceptual Discharge Option (page 9-5). We request that the pertinent response information on page 17 be incorporated into the SPDIR.

McLaren/Hart's Response:

The proposal of utilizing modeling to evaluate re-injection of treated water directly into the aquifer and into the wetlands area as a means of mitigating any remedial impacts should be considered incorporated by reference. The specific modeling tasks will be proposed to EPA and PADEP for review and approval as part of the integrated OU3/OU5 pre-design activities to be completed. what pre-design activity. You have submitted design activities & Exp Plans explain.

3. **Comment from Lynn Flowers, USEPA**

The issue of potential fish contamination remains for two reasons:

(1) The detections of di(2-ethylhexyl)phthalate in fish (average of 99 ppm and maximum of 480 ppm) during the 1988 fish sampling event may warrant additional sampling. It would appear that phthalates are not expected to be a large contributor to the surface water/fish contamination at the site based on sampling soil, groundwater and surface water, however, it would seem prudent to follow up on the fish sampling results due to the high concentrations observed; and

(2) The estimated increased cancer risk using the bioconcentration calculations for organics in fish is of concern (1E-4 to 1E-3 risk range). It is recommended that fish sampling be performed to determine whether halogenated organics (which are undoubtedly present in high concentrations in the surface water) are present at unacceptable levels in the fish.

McLaren/Hart's Response:

BEHP

With regard to detections of BEHP, McLaren/Hart has maintained that based on previous evaluations of the data; if appears that on-going sources of BEHP to Manses Creek are limited and not likely to be predominately site-related. The available data does not suggest that groundwater has been significantly impacted with BEHP from on-site sources. Subsurface conditions are not anticipated to act as a source of BEHP in Manses Creek.

While this appears to have been acknowledged by EPA; follow-up on the fish sampling results is discussed. McLaren/Hart proposes that follow-up include additional surface water sampling

and analysis for BEHP in Mauses Creek as part of the long-term monitoring program that will be established based on implementation of the OU3/OU5 remedial action. An evaluation of the need for sampling/analysis of fish tissue can then be made.

Halogenated Organics
In the April 24, 2000 response to EPA comments, a series of mitigating factors were described (pps 13 and 14 of April 24, 2000 correspondence) that would address concerns about the realistic potential for impacts to humans through fish consumption.

Based on those mitigating factors and since the most significant concentrations of halogenated organics were detected during low flow conditions in Mauses Creek; McLaren/Hart proposes that follow-up include additional surface water sampling and analysis for halogenated organics of potential concern in Mauses Creek as part of the proposed long-term monitoring program. An evaluation on the need for fish sampling/analysis can then be conducted based on the implementation of the OU3/OU5 remedial action and associated long-term monitoring.

4. Comment from Kevin Kroculick, PADEP

It should be noted that on page 18, EPA notes that acetone was detected in a Mauses Creek sediment samples, upgradient of the MW site.

As was stated in the comments, the acetone levels were relatively low (19 and 68 ppb), and outside of the surrogate recovery range. However ,on May 18, 2000, the Department collected six additional sediment samples in an effort to better explain these acetone levels.

No acetone was detected above the detection limits. These detention limits were much higher than they were during the April 30, 1997, samples, regarding acetone, are suspect. It appears that the detection limits for the 1997 sampling event was unrealistically low. Consequently, at this time, no further action is planned by the Department regarding upstream Mauses Creek sampling.

It should be noted that PCE was detected at 204 ug/kg in a sediment sample collected just north of the wwpt, (south of the roadside park).

McLaren/Hart's Response:

PADEP's comments regarding the detection of acetone in sediment are noted.